

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

E. HANLIN BAVELY, CHAPTER 7
TRUSTEE OF AAA SPORTS, INC.

Plaintiff,

v.

PANINI AMERICA, INC.

Defendant.

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Case No. 4:22-cv-00093

JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION TO SEAL
MOTION TO COMPEL DISCOVERY FROM DEFENDANT**

Plaintiff E. Hanlin Bavely, Chapter 7 Trustee of AAA Sports, Inc. (“Plaintiff”), respectfully files this Unopposed Motion to Seal its Motion to Compel Discovery from Defendant Panini America, Inc.’s (“Panini” or “Defendant”), as required by Local Rule CV-5(a)(7), and would show the Court as follows:

On February 10, 2022, Plaintiff filed the above-captioned lawsuit against Defendant. *See* Dkt. No. 1.

On July 6, 2022, the Court issued a protective order governing the handling of confidential documents and information produced or disclosed by the parties in this action. *See* Dkt. No. 27 (the “Protective Order”).

Plaintiff seeks to seal certain information designated as confidential and attorney eyes only under the terms of the Protective Order. The specific information and materials Plaintiff seeks to seal is: Plaintiff’s Motion to Compel Discovery from Defendant (the “Motion to Compel”) and the accompanying exhibits. Filing the Motion to Compel and the exhibits under seal ensures that

confidential and attorney eyes only information is not seen by or disseminated to unauthorized parties.

Dated: September 16, 2022

Respectfully submitted,

/s/ Gary R. Sorden

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ATTORNEYS FOR PLAINTIFF

**E. HANLIN BAVELY, CHAPTER 7 TRUSTEE
OF AAA SPORTS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2022 a true and correct copy of the foregoing was served on all counsel of record via electronic mail

/s/ Gary R. Sorden
Gary R. Sorden

CERTIFICATE OF COMPLIANCE

Plaintiff's counsel has complied with the substantive meet-and-confer requirement in Local Rule CV-7(h) with respect to this motion. Defendant does not oppose this motion.

/s/ Gary R. Sorden
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